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February 28, 2014

VIA MAIL SERVICE

Stauffer Chemical Company
c/o CT Corporation
818 W. 7th Street, Suite 200
Los Angeles, CA 90017

Re: Freedom of Information Act Request
Adolfo Parga and Juanita Parga v. Caterpillar Industrial, Inc., et al.
Los Angeles County Superior Court Case No. BC520598
Our Client: ArvinMeritor, Inc.

Dear FOIA Coordinator:

We are requesting the disclosure of the following records pursuant to the California Public Records Act (Government Code section 6250, *et seq.*), within the next ten business days. All requested records pertain to the following location:

- **Stauffer Chemical Corporation located at 20201 Normandie Avenue, Torrance, CA from 1950-Present.**

(1) Any records or documents¹ pertaining to the practices, maintenance, and safety procedures of the work performed at the location above, which in any way involved industrial chemicals.

¹ The term "record" and the term "document" are used in the broadest sense possible and mean the original and any non-identical copy (e.g., any copy which is different from the original in any way) of any written, recorded, printed, typewritten, or handwritten matter of any kind or nature (however produced, reproduced, or recorded), including but without limitation, all blueprints, work specifications, daily reports, time cards, letters, telegrams, e-mail, facsimiles, memoranda, reports (preliminary and final), studies, samples, testing protocols, diaries, logs, maps, pamphlets, notes, charts, graphs, calendars, schedules, tabulations, analysis, statistical information, accumulations, books, magazines, telephone bills, minutes, summaries, or other records of meetings, conversations, and hearings of any kind, photographs, slides, videotapes, film impressions, data, data compilations, computer files, computer documents, audiotape recordings, magnetic tapes, sound or mechanical reproductions, computer printouts, contracts, drafts of contracts, leases, subleases, instruments, agreements, warnings, directives, instructions, citations, violations, drawings, hearing transcripts, reports, summaries of investigations or negotiations, opinions or reports of consultations, consultants, or proposed experts, and press releases, now or at any time in the Stauffer Chemicals Corporation's possession, custody, or control or known or believed by the Stauffer Chemical Corporation to exist or have existed. "Record" or "document" also includes any underlying documents used to create summaries or other reports of financial or other data.

(2) Any records or documents identifying any and all persons, contractors, or other entities who is involved in the practices, maintenance, and safety procedures of the work performed at the location above, which in any way involved industrial chemicals.

(3) Any records or documents pertaining to any industrial chemical clean up work or alcohol clean up work performed at the location.

(4) Any records, documents, or letters from the Stauffer Chemical Corporation pertaining to warnings, citations, or violations at the location, which in any way involved industrial chemicals or alcohol spills.

(5) Any written communication from the Stauffer Chemical Corporation to the location, which in any way involved industrial chemicals.

Government Code section 6253 allows you to segregate material that is exempt from material that is not exempt. If you determine that some portion of the requested documents is exempt, please provide me with the remainder of the documents. If you determine that some of the documents are exempt from release, please justify withholding of those records by demonstrating that the records are exempt or that the public interest in confidentiality outweighs the public interest in disclosure. (Gov. Code. § 6255). I reserve the right to appeal any such determination.

We agree to pay the reasonable costs involved in retrieving and copying the records requested. If there is a charge for this information, please advise if the charge exceeds \$50.00.

As provided in section 6253(c), I expect to receive a reply to my request within ten (10) business days. If you have any questions, please feel free to contact Grace Chang at (213) 486-8036 or by e-mail at gchang@hptylaw.com.

Sincerely,

**HAWKINS PARNELL
THACKSTON & YOUNG^{LLP}**



Grace Chang
Paralegal

KMB/gc